

**REMARKS****INTRODUCTION**

In accordance with the foregoing, claim 15 has been amended. No new matter has been submitted and reconsideration of the allowability of all claims is respectfully requested.

Claims 1-19 are pending and under consideration, with claims 1-7 and 17-19 having been allowed and claims 13 and 16 indicated as including allowable subject matter.

**REJECTION UNDER 35 USC §112**

Claim 15 stands rejected under 35 USC §112, second paragraph, as being indefinite as only setting forth functional language. Claim 15 has been amended to clarify that the claimed gateway is configured to implement the claimed features.

Withdrawal of this rejection is respectfully requested.

**REJECTION UNDER 35 USC §102**

Claims 8-12 and 14 stand rejected under 35 USC §102(e) as being anticipated by Grundy et al., U.S. Publication No. 2004/0010653. This rejection is respectfully traversed.

By way of review and only as an example, claim 8 sets forth:

"[a] control method of a gateway comprising a first port connected to a network and a second port connected to a target node and being employed for a data stream between the network and applications of the target node, the control method comprising:

storing an IP address of the target node;  
setting an IP address of the second port based on the IP address of the target node; and  
setting the IP address of the target node as an IP address of the first port."

The Office Action states that Grundy et al. sets forth all the claimed features of independent claims 8 and 14. Applicants respectfully disagree.

The Office Action states that FIG. 1 of Grundy et al. illustrates a gateway with a plurality of ports communicates "with DHCP server that store addressing information (storing an IP address); the processor 108 performs routing function by assigning local IP addresses to each port[] on the gateway [0053]; in particular, fig. 2 teaches step 219 determines whether the destination node (target node) should be routed locally or via WAN whereby based the destination node sets a local addresses (an IP address) to each port[] (first and second port)

wherein the local address are the same."

Applicants respectfully submit that Grundy et al. has been misinterpreted.

Grundy et al. in FIG. 1 shows a gateway 100 that may be connected to outside services, e.g., through communications interface circuitry 110 and broadband line 112, with memory to store IP addresses and I/O ports 120.

In Grundy et al., different devices may be connected to each I/O port 120, e.g., one port 120 may be an Ethernet port and another port 120 may be a parallel port, a USB, etc. One port 120 is assigned or may have a "real" routable IP address and the remaining ports 120 have preset local address IP addresses. See Grundy et al. in paragraph [0027].

In Grundy et al. there is no disclosure or suggestion that any port 120 has the same IP address. Further the referenced DHCP server of Grundy et al. is related to the gateway communicating with outside networks to identify the dynamic IP address assigned to the gateway by the outside network so the gateway can communicate with the outside network.

The Office Action references paragraph [0053], which sets forth similar relevant language as paragraph [0027], to support an interpretation of Grundy et al. of setting at least two ports 120 to have the same IP address.

However, Grundy et al. particularly recites: "Preferably, the local IP addresses that correspond to non-routable I/O Ports 120 are static, being defined at the time of manufacture. Since the non-routable ports are local to the gateway 100, each gateway manufactured can have the same addresses for the non-routable ports"(paragraph [0027]); and "Additionally, with each port having its own IP address, the gateway serves as a miniature network for all the devices connected to the gateway. Since the local IP addresses are not routable, every gateway uses the same IP addresses for the same type of port. Thus, the manufacturer arbitrarily assigns the same local IP address for the same type of port on each gateway" (paragraph [0053]).

Thus, local IP addresses for two ports on the same gateway are not the same. Rather, the same port on two different gateways may have the same local IP address.

Lastly, the Office Action has indicated that the routing operation of Grundy et al. can be used to meet the claimed setting of the IP address of the target node as an IP address of the first port. However, the routing operation referenced in Grundy et al., e.g., in paragraphs [0032]-[0034], and [0041], appear to be merely conventional routing based upon the different IP addresses of each port. If PC of FIG. 1 has the real IP address it can communicate with the other ports based upon their respective different local IP addresses.

However, these portions of Grundy et al. do not appear to disclose or suggest such a claimed setting of the IP address of the target node as the IP address of the first port.

In Grundy et al. there does not appear to be any discussion or suggestion that one IP address for one port is set as the IP address of another port. Conversely, as noted above, Grundy et al. would appear to particularly teach away from such an feature by explaining that each port, apparently except the Real IP address port, preferably has a manufacturer fixed local IP address, i.e., none of the non-routable ports IP addresses change. Further, the Real IP address of the one port would also not be set to one of the other non-routable port's IP address as the gateway could not then distinguish between either port.

Accordingly, it is respectfully submitted that Grundy et al. cannot be interpreted as disclosing or suggestion all the claim features of independent claim 8. Claims depending from claim 8 are also allowable for their respective features and their dependence from claim 8. Lastly, independent claim 14 sets forth similar allowable features as claim 8, with differing scope and breadth.

Withdrawal of this rejection and allowance of all pending claims is respectfully requested.

## CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

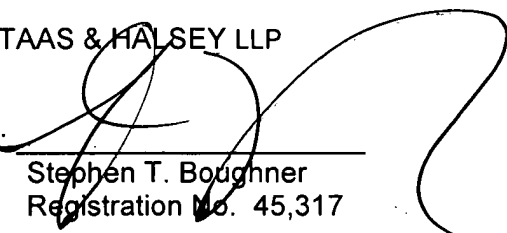
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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